

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p>	
<p>Caption in Compliance with D.N.J. LBR 9004-1(b) GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p>BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
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In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

**THOSE PARTIES LISTED ON
APPENDIX A TO COMPLAINT
and JOHN AND JANE
DOES 1-1000,**

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

Adv. Pro. No. 23-01092 (MBK)

APPLICATION FOR ORDER SHORTENING TIME

The applicant, Donald W. Clarke, Esq., on behalf of Official Committee of Talc Claimants (the “Committee”), requests that the time period for the Motion of the Official Committee of Talc Claimants to Intervene in the Preliminary Injunction Adversary Proceeding (the “Motion”) be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because:

Three (3) days ago, on April 14, 2023, the United States Trustee appointed the Official Committee of Talc Claimants in the above main case. [Case No.: 23-12825; Doc 162] On April 18, 2023, at 10:00 a.m., the Court has scheduled a hearing on several matters filed by the Debtor, including the Debtor’s request for a preliminary injunction. The Federal Rules grant the Committee, as the official fiduciary representative of talc claimants, the absolute right to intervene

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

in order to speak directly for such creditors and ensure that their interests are fully protected in the Adversary Proceeding.

2. The Committee respectfully requests this matter be listed for April 18, 2023, at 10:00 a.m., the same date as the hearing scheduled for the preliminary injunction in this adversary proceeding.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Date: April 17, 2023

/s/ Daniel Stolz
Signature

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